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FCC-Secretary

**WILKES LONG DISTANCE SERVICE**

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June 28, 2004

JUN 30 2004

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20544

Re: In the Matter of The Pay Telephone Reclassification and Compensation  
Provisions of the Telecommunications Act of 1996, CC Docket 96-128

Dear Ms. Dortch:

Wilkes Communications, Inc. d/b/a Wilkes Long Distance Service (WLDS) submits this transmittal and accompanying certification as record that WLDS is not a "Completing Carrier" as that term is defined in the Federal Communications Commission's (Commission) Order in CC Docket 96-128 (Order), released on October 3, 2003.

As WLDS is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to Payphone Service Providers, WLDS is not subject to such requirements at this time. If WLDS's operations are altered to the extent that WLDS necessarily becomes a Completing Carrier, WLDS will fully comply with the Commission's rules pertaining to the existing requirements and all other payphone compensation and reporting matters.

Sincerely,

Larry B. Houck

Vice President

Wilkes Communications, Inc. d/b/a Wilkes  
Long Distance Service

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Enclosure

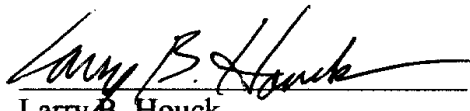
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<sup>1</sup> *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Report and Order (2003) (Order).*

**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION  
OF WILKES COMMUNICATIONS, INC. d/b/a WILKES LONG DISTANCE  
SERVICE**

1. My name is Larry B. Houck. I currently serve as the Vice President of Wilkes Communications, Inc. d/b/a Wilkes Long Distance Service (WLDS), a provider of interstate interexchange telecommunications services as a switchless toll reseller in the state of Georgia. In this capacity, I have become familiar with the network operations of WLDS and its practices associated with the completion of calls originated from Pay Telephones.
2. WLDS is not a Completing Carrier as defined by the Federal Communications Commission (Commission) in 47 CFR § 64.1300.
3. WLDS does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.
4. WLDS does not create call detail records for either access code calls or subscriber toll-free payphone calls. WLDS's action with respect to call detail records is limited to rating and billing.
5. In consideration of the aforementioned facts, WLDS is not subject to the compensation or reporting requirements related to the Commission's Report and Order<sup>1</sup> and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 28, 2004.



Larry B. Houck  
Vice President  
Wilkes Communications, Inc. d/b/a Wilkes Long  
Distance Service  
110 East Liberty Street , P. O. Box 70  
Washington, Georgia 30673

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<sup>1</sup> *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, Report and Order, (2003) (Order).